

MENNIES & PALMER, LLC

BY: RICHARD J. MENNIES, ESQUIRE

RYAN A. PALMER, ESQUIRE

IDENTIFICATION NO. 43966/202326

10 EAST 6TH AVENUE

CONSHOHOCKEN, PA 19428

610-490-8001

ATTORNEY FOR DEFENDANT

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Paulette Jones

vs.

Amica Mutual Insurance Company

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NO: 19-cv-01425

**DEFENDANT AMICA MUTUAL INSURANCE COMPANY'S
INITIAL RULE 26(A) DISCLOSURES**

AND NOW COMES Defendant, Amica Mutual Insurance Company, by and through its attorneys, Mennies & Palmer, LLC, pursuant to Federal Rule of Civil Procedure 26(a), hereby provides the following initial disclosures:

OBJECTIONS

Defendant Amica Mutual Insurance Company hereby objects to the disclosure of any privileged or confidential information protected by the attorney-client privilege or the attorney work product doctrine. Defendant further objects to the discovery of irrelevant information, or any other form of discovery prohibited by the Federal Rules of Civil Procedure.

These Disclosures are made subject to the above objections, and are based upon information presently available to Defendant. Defendant reserves the right to supplement or amend these Disclosures as discovery develops up to and including the time of trial.

A. THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION.

1. Plaintiff - Paulette Jones, 1024 Belvoir Road, Plymouth Meeting, PA 19462.
2. Sean P. Murtha, 1636 Devon Court, Yardley, PA 19067.
3. Police Officers from the Plymouth Township Police Department.
4. A representative and/or representatives of Amica Mutual Insurance Company, 100 Amica Way, Lincoln, Rhode Island 02865.
5. Plaintiff's medical providers (and/or experts).
6. Any and all individuals identified by Plaintiff.
7. Defendant reserves the right to supplement this list in accordance with the Federal Rules of Civil Procedure and any Orders of this Court.

B. DESCRIPTION BY CATEGORY AND LOCATION OF DOCUMENTS AND THINGS IN THE POSSESSION OF DEFENDANT THAT DEFENDANT MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES

1. Police Crash Reporting Form; dated 12/9/14.
2. Medical records for Plaintiff Paulette Jones.
3. Vehicle photographs.
4. Non-privileged Records of Amica Mutual Insurance Company.
5. Documents and tangible items identified within Defendant's Initial Disclosures.
6. Documents and tangible items identified within Plaintiff's Initial Disclosures.
7. Documents and tangible items produced by Plaintiff and/or Defendant during the course of litigation.
8. Defendant reserves the right to supplement this list in accordance with the Federal Rules of Civil Procedure and any Orders of this Court.

C. COMPUTATION OF ANY CATEGORY OF DAMAGES CLAIMED BY THE DISCLOSING PARTY

Not applicable as to Defendant. Without adoption or admission, see Plaintiff's Initial Disclosures.

D. THE EXISTENCE AND CONTENT OF ANY INSURANCE AGREEMENT

Defendant is Amica Mutual Insurance Company. The subject lawsuit pertains to a motor vehicle accident regarding insurance coverage and related claim for under-insured motorist (UIM) benefits pursuant to policy No. 950437-20SN, and claim No. 6001989980.

MENNIES & PALMER, LLC

BY: /s/ Richard J. Mennies
RICHARD J. MENNIES, ESQUIRE
RYAN A. PALMER, ESQUIRE
Validation of Signature Code RM1252
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Dated: June 11, 2019

MENNIES & PALMER, LLC
BY: RICHARD J. MENNIES, ESQUIRE
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CERTIFICATE OF SERVICE

I, Richard J. Mennies, Esquire, hereby certify that I served a true and correct copy of
Defendant Amica Mutual Insurance Company's Initial Rule 26(a) Disclosures via electronic mail
upon the following:

Jay Fulmer, Esquire
Law Offices of Jay Fulmer
8 Penn Center
1628 JFK Boulevard, Ste. 1000
Philadelphia, PA 19103
Jay.fulmer@gmail.com

/s/ Richard J. Mennies
RICHARD J. MENNIES, ESQUIRE

Dated: June 11, 2019